



BEFORE THE ARIZONA CORPORATION CO.

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COMMISSIONERS

2005 SEP 21 P 4: 46

JEFF HATCH-MILLER, Chairman
WILLIAM A. MUNDELL
MARC SPITZER
MIKE GLEASON
KRISTIN K. MAYES

AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE OF THE JOINT
NOTICE OF INTENT OF VERIZON
COMMUNICATIONS, INC., AND MCI
INC., ON BEHALF OF ITS REGULATED
SUBSIDIARIES

DOCKET NO. T-01846B-05-0279
T-03258A-05-0279
T-03475A-05-0279
T-03289A-05-0279
T-03198A-05-0279
T-03574A-05-0279
T-02431A-05-0279
T-03197A-05-0279
T-02533A-05-0279
T-03394A-05-0279
T-03291A-05-0279

NOTICE OF FILING STATEMENT AND LATE FILED EXHIBITS

At the hearing on September 14, 2005, the Administrative Law Judge ("ALJ") asked the parties to file a statement concerning the impact of a state commission's rejection upon the Verizon/MCI merger.

The ALJ also asked Staff to file the following late-filed exhibits: (1) whether Verizon Select Services and MCI/Worldcom offers AOS and whether they are complying with the zero-minus rules; (2) a breakdown of the complaints against Verizon and MCI subsidiaries; and 3) the number of complaints/inquiries filed with the Commission concerning Verizon Wireless.

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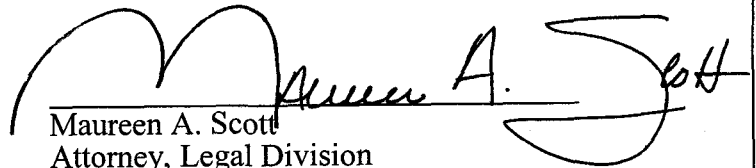
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1 Attached hereto is Staff's statement and late-filed exhibits as requested by the ALJ.

2 RESPECTFULLY SUBMITTED this 21st day of September, 2005.

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5 

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7 Attorney, Legal Division
8 Arizona Corporation Commission
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11 (602) 542-3402

12 Original and thirteen (13) copies
13 of the foregoing were filed this
14 21st day of September, 2005 with:

15 Docket Control
16 Arizona Corporation Commission
17 1200 West Washington Street
18 Phoenix, Arizona 85007

19 Copy of the foregoing mailed this
20 21st day of September, 2005 to:

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STATEMENT REGARDING RAMIFICATIONS OF A STATE REJECTING THE MERGER

At the hearing on September 14, 2005, the ALJ asked the parties and Staff to provide a statement on the effect upon the merger of any state commission denying the joint application for merger of Verizon and MCI (collectively "the Companies").

I. Ramifications Under Merger Agreement

The Agreement and Plan of Merger dated February 14, 2005, ("Merger Agreement") between Verizon Communications Inc., ELI Acquisition, LLC and MCI, Inc. contains several provisions which appear to contemplate this contingency.

Article III (*Representations and Warranties of the Company*), Section 3.7 (*Consents and Approvals; No Violations*) of the Merger Agreement recognizes that approval by various federal and state regulatory agencies is required. See also Article IV (*Representations and Warranties of Parent and Merger Sub*) Section 4.4 (*Consents and Approvals; No Violations*) of the Agreement.

Under Article VI (*Additional Agreements*), Section 6.4 (*Commercially Reasonable Efforts*) the parties commit to use commercially reasonable efforts to obtain all requisite material approvals for the transactions contemplated by the Merger Agreement. If an objection is asserted with respect to the transaction contemplated under the Merger Agreement under any "Regulatory Law", the Companies shall use commercially reasonable efforts to resolve any such objections or challenge.

Article VII (*Conditions Precedent*), Section 7 of the Merger Agreement contains the conditions precedent for consummation of the merger. Section 7.1(c) of the Merger Agreement recognizes as a condition precedent regulatory approval by various federal and state agencies.

Article VIII (*Termination and Amendment*), Section 8(b)(i) provides for termination by either party if the merger is not consummated by February 14, 2006, subject to certain conditions. First, the consummation date of February 14, 2006, can be

extended up to 180 days "...in the event that, as of February 14, 2006, the conditions set forth in Section 7.1(c) or (g) have not been satisfied,...." Second, the ability to terminate is not available to any party whose "failure to perform any of its obligations under this Agreement primarily contributes to the failure of the Merger to be consummated by such time. Section 8.2 provides that if the Merger Agreement is terminated under Section 8.1, the obligations of the parties terminate and there shall be no liability on the part of any party (with exceptions pertaining to provisions on confidentiality, breach of contract etc.)

II. Ramifications Under Federal and State Law and Rules

Verizon and MCI filed an application for transfer of control with the FCC on March 11, 2005. The application was filed pursuant to Section 214 of the Communications Act of 1934, as amended, and 47 C.F.R. Section 63.04 of the FCC's rules, which pertains to the construction or transfer of interstate lines used in the provision of telecommunications service. In its 1999 Streamlining Order¹, the FCC revised section 63.01 of its rules granting all carriers blanket authority under section 214 to provide domestic interstate and international services and to construct, acquire, or operate any domestic or international transmission line. This blanket authority does not extend to the transfer of lines resulting from an acquisition of corporate control or an acquisition of a carrier's assets. The application the Companies filed with the FCC requests a transfer of approximately 18 to 22 FCC licenses and authorizations controlled by MCI or its subsidiaries to Verizon. These licenses are:

Part 1 – Cable Landing Licenses

MCI, Inc. (SCL-LIC-19970421-0002, et al.)
MCI International, Inc. (SCL 90-003, et al.)
MCI Communications Corp. (SCL 92-002, et al.)
MFS Globenet, Inc. (SCL-LIC-19971014-00009)

Part 22 – Paging and Radiotelephone Service Licenses Skytel Corp. (KNKO426 et al.)

¹ *In the Matters of Implementation of Section 401(b)(2)(A) of the Telecommunications Act of 1996*, CC Docket No. 97-11 and *Petition for Forbearance of the Independent Telephone & Telecommunications Alliance*, ADD File No. 98-43, Report and Order in CC Docket No. 97-11 and Second Memorandum Opinion and Order in AAD File No. 98-43, (Released June 30, 1999) ("1999 Streamlining Order").

- Part 22 – General Aviation Air-Ground Radio Service Licenses
Skytel Corp. (KCC703, et al.)
- Part 22 – 931 MHz Paging Licenses
Skytel Corp. (WPZG507, et al.)
- Part 24 - PCS Narrowband Licenses
Skytel Corp. (KNKV205 et al.)
- Part 25 – Earth Station Licenses
MCI WorldCom International, Inc. (E881473, et al.)
MCI WorldCom Network Services, Inc. (E000011, et al.)
- Part 63 - Domestic Section 214 Authorizations
MCI, Inc., et al.
- Part 63 – International Section 214 Authorizations
MCI, Inc. (File No. ITC-214-19961212-00626, et al.)
MCI Communications Corp. (ITC-90-128, et al.)
MCI International, Inc. (ITC-89-155, et al.)
MCI WorldCom Communications, Inc. (ITC-93-065, et al.)
MCI WorldCom International, Inc. (ITC-214-19961003-00486, et al.)
MCI WorldCom Network Services, Inc. (ITC-87-184, et al.)
MFS Globenet, Inc. (ITC-98-622)
- Part 90 – Private Mobile Radio Service Licenses
MCI WorldCom Communications, Inc. (WPNU610, et al.)
MCI WorldCom Network Services, Inc. (KA78954, et al.)
- Part 101 – Point-to-Point Microwave Service Licenses
MCI WorldCom Network Services, Inc. (WAX65, et al.)
Intermedia Communications LLC (KCL 96, et al.)

In considering such applications for license transfer, the FCC has employed a public interest standard under Section 214(a) that involves an examination of the potential public interest harms and benefits of the proposed transactions. The application before the FCC pertaining to the transfer of the above-listed licenses is still pending.

Under state law, the Companies submitted their application pursuant to the Arizona Commission's Public Utility Holding Companies and Affiliated Interest Rules, R14-2-801 *et seq.* A.A.C. R14-2-803(C) establishes a minimum standard for Commission consideration of affiliate transactions but it is not the only applicable standard of review. The Commission must act in the "public interest," which is a broad inquiry in which the

Commission examines all the evidence available in determining what is in the public interest.²

Thus, while both the FCC analysis and this Commission's analysis look at the application in part under the broad public interest standard, the FCC's analysis focuses on the transfer of interstate and international licenses and authorizations which it has granted; while the Commission's focus is on the impact of the merger on the Companies' intrastate operations.

Staff believes that the ramifications of a state rejecting the Companies' application under state law would have to be addressed by the Applicants in one of several ways. First, the Companies could work to resolve the state commission's concerns, and indeed, they appear to be obligated to do so under the Merger Agreement. Second, if the concerns can not be resolved despite the parties' best efforts, the parties could decide to not proceed with the Merger Agreement. Third, the Companies would also have the option of seeking approval to divest the lines and operations to third parties in the particular state that has not approved the merger as presented by Companies. While Staff believes that the first option is preferable, the decision is ultimately up to the Companies.

² *In the Matter of the Reorganization of Unisource Energy Corporation*, Docket No. E-04230A-03-0933, Decision No. 67454, p. 28 (January 4, 2005).

Q1(a): Does Verizon Select Service provide AOS services in AZ? Is Verizon Select Service in compliance with the ACC's zero-minus AOS rules?

A1(a): Decision 63546 (4/4/01) granted Verizon Select Select a CC&N to provide AOS. In response to Staff's first set of data requests, Verizon provided the following.

"JFB 1-5: Does Verizon Select Services Inc. currently provide resold and facilities-based local exchange and resold long distance telecommunications services and alternative operator services in Arizona? Indicate the telecommunication services you currently provide in Arizona.

Verizon Response: As noted in VSSI Tariffs Section Price List No. 1 (see Verizon website referred to in JFB1-3), VSSI provides the following resold long distance services. Long Distance Voice Telephone Service, Calling Cards, Operator Services, Inmate Services, Payphone Services, Toll Free Services, Digital Private Line Services and Frame Relay Services. Verizon Select Services Inc. (VSSI) does not provide local exchange service in Arizona, other than incidental local calls provided through the use of calling cards.

Respondent: Elaine M. Duncan
VP & General Counsel
Verizon California
711 Van Ness Avenue, Suite 300
San Francisco, CA 94102"

In the brief period since the 9/14/05 hearing, Staff has been unable to reach the essential Verizon personnel to completely confirm Verizon's understanding, however, Staff believes that Verizon Select Services does not provide AOS services in Arizona. Operating as a certified interexchange carrier, Verizon Select Services does have authorized operator services tariffs.¹ The following rates from Verizon Select Services, Arizona C.C. Price List No. 1, 7th Revised Page 54, Cancels 6th Revised Page 54:

Operator Assisted Service Charges

Per Call

¹ "Alternative Operator Services" or "AOS" means provision by an entity, other than a local exchange carrier or a certificated interexchange carrier with authorized operator service tariffs, of any telecommunications service initiated from an aggregator location where automated and/ or live assistance is provided to a consumer in order to arrange for billing or completion of an intrastate telephone call. Store and forward payphones are not included within this definition.

O+ (Calling Card, Calling Card Operator Assisted, Credit Card, Credit Card Operator Assisted, Collect, Bill-to-Third Number)	\$2.30
O- (Calling Card, Calling Card Operator Assisted, Credit Card, Credit Card Operator Assisted, Collect, Bill-to-Third Number)	3.99

Although authorized to provide AOS service, Verizon Select Services does not provide AOS services.

Additionally, the Commission's Consumer Services and Compliance Staffs do not have any record of complaints concerning Verizon Select Services AOS services;

Staff Respondent: Armando Fimbres

Q1(b): Does MCI WorldCom provide AOS services in AZ? Is MCI WorldCom in compliance with the ACC's zero-minus AOS rules?

A1(b): Decision 59629 (4/24/96) granted MCI WorldCom a CC&N to provide AOS, however, in response to Staff's first set of data requests, MCI provided the following response that indicates MCI WorldCom is not operating as an AOS:

"JFB 1-21: Does MCI WorldCom Communications, Inc. currently provide currently provide customer-owned pay telephone services, facilities-based local exchange telecommunications services and alternative operator services in Arizona? Indicate the telecommunication services you currently provide in Arizona.

MCI Response: No MCI WorldCom Communications, Inc. ("MCIWC") maintains an AOS tariff (MCI WorldCom Communications, Inc., Arizona Tariff No. 4).

Respondents: Tom Dixon, Attorney
and Randee Klindworth
Tariff Administrator
707 - 17th Street, #4200
Denver, Colorado 80202"

Staff understands that MCI does not provide AOS services in Arizona but does maintain an AOS tariff. In the brief period since the 9/14/05 hearing Staff has been unable to reach the essential MCI personnel to completely confirm why MCI maintains its AOS tariff without providing AOS services. The following rates from MCI WorldCom Communications, Inc., Arizona Tariff No. 4, Original Sheets 20 & 21:

4.4.2 Additional Charges

The following per-call charges apply to all calls in addition to the per minute usage rates. These charges apply in all rate periods

Customer Dialed Calling Card Station	\$0.80
Operator Station	\$1.75
Person-to-Person	\$3.50

4.5 Operator Dialed Surcharge

Service Charge Per Call	\$2.00
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Although authorized to provide AOS service, MCI WorldCom does not provide AOS services and, therefore, is in compliance with R14-02-1006.

Additionally, the Commission's Consumer Services and Compliance Staffs do not have any record of complaints concerning MCI WorldCom AOS services

Staff Respondent: Armando Fimbres

**BREAKDOWN OF COMPLAINTS
AGAINST VERIZON AND MCI SUBSIDIARIES**

Late Filed Exhibit 2.

MEMORANDUM - updated

TO: John Bostwick
Administrative Services Officer II
Utilities Division

FROM: Carmen Madrid
Public Utility Consumer Analyst
Utilities Division

DATE: June 2, 2005 (updated 7/28/05)

RE: Verizon California Inc.	Docket No. T-01846B-05-0279
Verizon Select Services Inc.	Docket No. T-03258A-05-0279
OnePoint Communications –	
Colorado, L.L.C. dba Verizon Avenue	Docket No. T-03457A-05-0279
Bell Atlantic Communications, Inc. dba	
Verizon Long Distance	Docket No. T-03289A-05-0279
NYNEX Long Distance Company dba	
Verizon Enterprise Solutions	Docket No. T-03198A-05-0279
MCImetro Access Transmission	
Services, L.L.C.	Docket No. T-03574A-05-0279
MCI WorldCom Network Services Inc.	Docket No. T-02431A-05-0279
TTI National, Inc.	Docket No. T-03197A-05-0279
Teleconnect Long Distance Services and	
Systems Company dba Telecom*USA	Docket No. T-02533A-05-0279
MCI WorldCom Communications, Inc.	Docket No. T-03394A-05-0279
Intermedia Communications, Inc.	Docket No. T-03291A-05-0279

Verizon California Inc. (Docket No. T-01846B-05-0279), Verizon Select Services Inc. (Docket No. T-03258A-05-0279), OnePoint Communications – Colorado, L.L.C. dba Verizon Avenue (Docket No. T-03457A-05-0279), Bell Atlantic Communications, Inc. dba Verizon Long Distance (Docket No. T-03289A-05-0279), NYNEX Long Distance Company dba Verizon Enterprise Solutions (Docket No. T-03198A-05-0279), MCImetro Access Transmission Services, L.L.C. (Docket No. T-03574A-05-0279), MCI WorldCom Network Services Inc. (Docket No. T-02431A-05-0279), TTI National, Inc. (Docket No. T-03197A-05-0279), Teleconnect Long Distance Services and Systems Company dba Telecom*USA (Docket No. T-02533A-05-0279), MCI WorldCom Communications, Inc. (Docket No. T-03394A-05-0279) and Intermedia Communications, Inc. (Docket No. T-03291A-05-0279), have applied for approval of an agreement and plan of merger with and into ELI Acquisition, LLC. ELI Acquisition will then be renamed MCI,LLC.

Per information received from the Corporations Section of the Arizona Corporation Commission on April 20, 2005 the following companies corporate status' are as follows:

1. Verizon California, Inc. is in good standing.
2. Verizon Select Services, Inc. is in good standing.

3. OnePoint Communications-Colorado, L.L.C. dba Verizon Avenue is in good standing.
4. Bell Atlantic Communications, Inc. dba Verizon Long Distance there is no registration under Verizon Long Distance. Bell Atlantic Communications, Inc. is in good standing.
5. NYNEX Long Distance Company dba Verizon Enterprises Solutions there is no registration under Verizon Enterprises Solutions. NYNEX Long Distance Company is in good standing.
6. MCImetro Access Transmission Services, L.L.C. is in good standing.
7. MCI WorldCom Network Services, Inc. is in good standing.
8. TTI National, Inc. is in good standing.
9. **Teleconnect Long Distance Services and Systems Company dba Telecom*USA there is no registration under Telecom*USA. Teleconnect Long Distance Services and Systems Company is not good standing delinquent annual report due 5/29/05.**
10. MCI WorldCom Communications, Inc. is in good standing.
11. Intermedia Communications has applied for a merger dated 4/11/05.

In researching the database for complaints for this company results are as listed below:

Verizon California Inc. (T-01846B-05-0279)

2005	2 complaints	0 opinions	0 inquiries
2004	1 complaints	0 opinions	4 inquiries
2003	1 complaints	0 opinions	4 inquiries
2002	1 complaints	0 opinions	0 inquiries

Verizon Select Services, Inc. (T-03258A-05-0279)

2005	2 complaints	0 opinions	0 inquiries
2004	0 complaints	0 opinions	0 inquiries
2003	0 complaints	0 opinions	1 inquiries
2002	2 complaints	0 opinions	1 inquiries

OnePoint Communications – Colorado, L.L.C. dba Verizon Avenue (T-03475A-05-0279)

2005	3 complaints	0 opinions	3 inquiries
2004	5 complaints	0 opinions	8 inquiries
2003	3 complaints	0 opinions	7 inquiries
2002	6 complaints	0 opinions	7 inquiries

Bell Atlantic Communications, Inc. dba Verizon Long Distance (T-03289A-05-0279)

2005	0 complaints	0 opinions	0 inquiries
2004	0 complaints	0 opinions	0 inquiries
2003	0 complaints	0 opinions	0 inquiries
2002	0 complaints	0 opinions	0 inquiries

NYNEX Long Distance Company dba Verizon Enterprise Solutions (T-03198A-05-0279)

2005	0 complaints	0 opinions	0 inquiries
2004	0 complaints	0 opinions	0 inquiries
2003	0 complaints	0 opinions	0 inquiries
2002	0 complaints	0 opinions	0 inquiries

MCImetro Access Transmission Services, L.L.C. (T-03574A-05-0279)

2005	0 complaints	0 opinions	0 inquiries
2004	0 complaints	0 opinions	0 inquiries
2003	0 complaints	0 opinions	0 inquiries
2002	0 complaints	0 opinions	0 inquiries

MCI WorldCom Network Services, Inc. (T-02431A-05-0279)

2005	0 complaints	0 opinions	0 inquiries
2004	0 complaints	0 opinions	1 inquiries
2003	0 complaints	0 opinions	5 inquiries
2002	3 complaints	0 opinions	2 inquiries

TTI National, Inc. (T-03197A-05-0279)

2005	0 complaints	0 opinions	0 inquiries
2004	1 complaints	0 opinions	0 inquiries
2003	0 complaints	0 opinions	0 inquiries
2002	0 complaints	0 opinions	0 inquiries

Teleconnect Long Distance Services and Systems Company dba Telecom*USA (T-02533A-05-0279)

2005	1 complaints	0 opinions	0 inquiries
2004	6 complaints	0 opinions	1 inquiries
2003	2 complaints	0 opinions	1 inquiries
2002	0 complaints	0 opinions	0 inquiries

MCI WorldCom Communications, Inc. (T-03394A-05-0279)

2005	63 complaints	1 opinions	4 inquiries
2004	152 complaints	3 opinions	37 inquiries
2003	146 complaints	5 opinions	99 inquiries
2002	178 complaints	1 opinions	190 inquiries

Intermedia Communications, Inc. (T-03291A-05-0279)

2005	0 complaints	0 opinions	0 inquiries
2004	0 complaints	0 opinions	0 inquiries
2003	0 complaints	0 opinions	0 inquiries
2002	0 complaints	0 opinions	0 inquiries

Q2: What are the number of inquiries and complaints received by Consumer Services during the last year against Verizon Wireless

A2: Consumer Services began tracking wireless complaints on 1/1/05. Consumer Services has a record of two logged inquiries and complaints for Verizon Wireless since 1/1/05.

Additionally, attached are comprehensive reports from Consumer Services regarding the inquiries and complaints for Verizon, MCI, AT&T and Qwest.

MEMORANDUM

TO: **Elijah Abinah**
Assistant Director
Utilities Division

FROM: Carmen Madrid
Public Utility Consumer Analyst
Utilities Division

DATE: **September 16, 2005**

RE: **Qwest Corporation**
Docket No. T-01051B

Qwest Corporation (T-01051B) has a certificate of convenience and necessity to provide telecommunication services in Arizona.

Per information received from the Corporations Section of the Arizona Corporation Commission on September 16, 2005 Qwest Corporation is in good standings

In researching the database for complaints for this company results are as listed below:

Qwest Corporation

2005	590 complaints	31 opinions	227 inquiries
2004	718 complaints	180 opinions	561 inquiries
2003	608 complaints	60 opinions	912 inquiries
2002	1310 complaints	221 opinions	1779 inquiries

MEMORANDUM

TO: **Elijah Abinah**
 Assistant Director
 Utilities Division

FROM: Carmen Madrid
 Public Utility Consumer Analyst
 Utilities Division

DATE: **September 20, 2005**

RE: **Qwest Corporation**
 Docket No. T-01051B

Qwest Corporation (T-01051B) has a certificate of convenience and necessity to provide telecommunication services in Arizona.

Per information received from the Corporations Section of the Arizona Corporation Commission on September 16, 2005 Qwest Corporation is in good standings

In researching the database for complaints that involves wireless services for this company the results are as listed below:

Qwest Corporation (wireless)

2005	5 complaints	2 opinions	66 inquiries
2004	6 complaints	125 opinions	122 inquiries
2003	6 complaints	8 opinions	98 inquiries
2002	4 complaints	30 opinions	322 inquiries

This information was gathered for complaint codes:

19E – Other – jurisdictional authority

19Z - Other – other

20D – Telecom issues - Cellular

MEMORANDUM

TO: **Elijah Abinah**
Assistant Director
Utilities Division

FROM: Carmen Madrid
Public Utility Consumer Analyst
Utilities Division

DATE: **September 21, 2005**

RE: **AT&T Communications of the Mountain States, Inc.**
Docket No. T-02428A

AT&T Communications of the Mountain States, Inc. (T-02428A) has a certificate of convenience and necessity to provide telecommunication services in Arizona.

Per information received from the Corporations Section of the Arizona Corporation Commission on September 21, 2005 AT&T Communications of the Mountain States, Inc. is in good standings

In researching the database for complaints for this company results are as listed below:

AT&T Communications of the Mountain States, Inc

2005	236 complaints	4 opinions	47 inquiries
2004	501 complaints	28 opinions	275 inquiries
2003	207 complaints	22 opinions	206 inquiries
2002	208 complaints	4 opinions	151 inquiries